



U.S. Department of Justice
Civil Division

July 9, 2025

By ECF

Honorable Michael E. Farbiarz
United States District Judge
U.S. Post Office & Courthouse
Federal Square
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al., Civ. Act. No. 25-1963 (MEF) (MAH)***
Government's Response to ECF No. 340

Dear Judge Farbiarz:

Respondents (“the Government”) respectfully submit this response to the Court’s order. *See* ECF No. 340. The Government provides the following update to the immigration proceedings.

Petitioner Mahmoud Khalil filed a motion for reconsideration with the Immigration Court shortly after 2:30 p.m. CDT on July 3, 2025.¹ *See* ECF No. 341. The motion is pending with the Immigration Court, and the Department of Homeland Security’s response, to the extent that one would be filed, is due on July 13, 2025. *See* EOIR Policy Manual, Part IV, 4.1(b); 4.2(d).

Respectfully submitted,

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¹ Petitioner also filed a motion to change venue on the same day. The Executive Office for Immigration Review rejected this motion because there is no pending case.